

**GENOVA BURNS LLC**

494 Broad Street  
Newark, New Jersey 07102  
Telephone: (973) 533-0777  
Facsimile: (973) 533-1112  
[agenova@genovaburns.com](mailto:agenova@genovaburns.com)  
[rparikh@genovaburns.com](mailto:rparikh@genovaburns.com)

**PERKINS COIE LLP**

700 13<sup>TH</sup> Street, NW, Suite 600  
Washington, D.C. 20005  
[melias@perkinscoie.com](mailto:melias@perkinscoie.com)

1 East Main Street, Suite 201  
Madison, Wisconsin 53703  
[jkaul@perkinscoie.com](mailto:jkaul@perkinscoie.com)

*Attorneys for Plaintiff Democratic National Committee*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

DEMOCRATIC NATIONAL COMMITTEE, *et al.*,

Plaintiffs,

v.

REPUBLICAN NATIONAL COMMITTEE, *et al.*,

Defendants.

Civil Action No.: 81-3876

**ORDER TO SHOW CAUSE WITH  
PRELIMINARY RESTRAINTS**

This matter has been brought before the Court on the application of Genova Burns LLC, attorneys for Plaintiff Democratic National Committee (“DNC”), for an Order requiring Defendant Republican National Committee (“RNC”) to show cause why it should not be held in civil contempt for violating the Consent Decree entered in this matter, as modified on July 27, 1987 and December 1, 2009 (the “Consent Decree”); and the Court having considered the

Consent Decree, the Memorandum in Support of DNC's Order to Show Cause, Certification of Counsel with Exhibits, and any arguments of counsel:

IT IS on this \_\_\_\_\_ day of \_\_\_\_\_, 2016,

ORDERED that on the \_\_\_\_\_ day of \_\_\_\_\_, 2016 at 10:00 in the forenoon, or as soon thereafter as counsel may be heard, Defendant RNC shall show cause before the Honorable \_\_\_\_\_, U.S.D.J., at the United States District Court for the District of New Jersey, located at 50 Walnut Street in Newark, New Jersey, why it should not be held in contempt of court for violating provisions of the Consent Decree, and sanctions should not be entered:

(a) prohibiting Defendant RNC and its agents, employees, subsidiaries, affiliates and/or assigns from violating the terms of the Consent Decree;

(b) prohibiting Defendant RNC from allocating any money to fund, reimburse expenses for, or provide support for Donald J. Trump and/or his campaign's voter intimidation program or his supporters' plans to "watch" "certain sections" and "other communities";

(c) directing Defendant RNC to seek reimbursement from the Trump campaign and all state political organizations for any funds previously allocated to fund any prohibited "ballot security" measures, including staff salaries, overhead expenses, training costs and expenses, digital resource expenditures, or any other resources used in any way to promote or facilitate the Trump campaign or state political organization "ballot security" or "integrity" endeavors;

(d) ordering Defendant RNC to distribute the Consent Decree and the relief awarded via this action to every RNC field office with instructions that no person employed by or affiliated with the RNC shall participate in any "ballot security" measures;

(e) ordering Defendant RNC to report to the Court and DNC within 24 hours upon learning of any efforts by RNC agents, employees, or affiliates, including any agent or employee of the RNC who is simultaneously employed by a state political organization or the Trump campaign, to engage in prohibited “ballot security” measures;

(f) finding that the Consent Decree shall be extended for eight (8) years; and

(g) awarding any other such equitable or injunctive relief as the Court deems equitable, just, and appropriate.

IT IS FURTHER ORDERED that a copy of this Order to Show Cause, together with all supporting papers, shall be served by DNC to counsel for the RNC immediately.

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, U.S.D.J.